

**North American Numbering Council
Meeting Minutes
January 19, 2005 (Final)**

I. Time and Place of Meeting. The North American Numbering Council held a meeting commencing at 9:30 a.m., at the Federal Communications Commission, 445 12th Street, S.W., TW-C305, Washington, D. C.

II. List of Attendees.

Voting Council Members:

1. Robert Atkinson	Chairman
2. Teresa Gaugler	ALTS
3. Mark Lancaster	AT&T
4. Fred McCallum, Jr.	BellSouth
5. Lori McGarry	CTIA
6. Stephen Trotman	CompTel/ASCENT Alliance
7. Karen Mulberry	MCI
8. Hon. Elliott Smith	NARUC, Iowa
9. Don Gray	NARUC - Nebraska
10. Christine Sealock Kelly	NARUC – New York
11. Joel Cheskis	NASUCA - Pennsylvania
12. Beth O'Donnell	NCTA
13. Rosemary Emmer	Nextel
14. John McHugh	OPASTCO
15. C. Courtney Jackson	OUR
16. John Jefferson	SBC Communications, Inc.
17. Hoke Knox	Sprint
18. Anna Miller	T-Mobile USA, Inc.
19. Thomas Soroka, Jr.	USTA
20. Douglas P. Sullivan	Verizon

Special Members (Non-voting):

John Manning	NANPA
Jean-Paul Emard	ATIS
Amy Putnam	PA
Faith Marcotte	Welch & Company

Commission Employees:

Sanford Williams, Designated Federal Officer (DFO)
Deborah Blue, Telecommunications Access Policy Division

III. Estimate of Public Attendance. Approximately 30 members of the public attended the meeting as observers.

IV. Documents Introduced.

- (1) Agenda
- (2) NANC Meeting Minutes – September 14, 2004
- (3) NANC Meeting Minutes – November 4, 2004
- (4) Billing and Collection Agent Report to the NANC
- (5) NANPA Report to the NANC
- (6) National Thousands Block Number Pooling Services Report
- (7) INC Report to the NANC
- (8) Safety Valve IMG Report to the NANC
- (9) LNPA Working Group Status Report to the NANC
- (10) LNPA Working Group Interpretation of N-1 Carrier Architecture
- (11) Numbering Oversight Working Group (NOWG) Report
- (12) Billing and Collection Working Group Report to the NANC
- (13) Future of Numbering Working Group Report to the NANC
- (14) List of NANC Accomplishments (January 2002 – January 19, 2005)

V. Summary of the Meeting.

John Jefferson, SBC, on behalf of the SMS/800 Number Administration Committee (SNAC), advised that the proposed changes to the SNAC Guidelines are not yet complete. He proposed that Item #8, Report of the SNAC Guidelines IMG, be removed from the Agenda. Chairman Atkinson stated that it will be moved to the March 15, 2005 Agenda.

Announcements and Recent News. Sanford Williams, DFO, announced that the FCC sent a letter to XO Communications indicating that its membership to the NANC has been terminated due to lack of attendance. Chairman Atkinson reminded members that the NANC is interested in having active participation.

A. Approval of Meeting Minutes. The September 14, 2004 and November 4, 2004 NANC Meeting Minutes were approved.

B. Billing and Collection Agent (B & C Agent) Report. Faith Marcotte, Welch and Company (Welch), provided the report to the Council. Ms. Marcotte reviewed the NANPA Fund Statement of Financial Position with the Council. She reported that as of December 31, 2004, the fund balance is approximately \$7.5 Million. Ms. Marcotte further reported that the assets are made up of cash and accounts receivable. The Accrued Liabilities are: NeuStar – NANPA Administration contract; NeuStar – Thousands Block Pooling contract; Welch & Company LLP – Billing and Collection Agent; overpayments due to US carriers; and payments due to the auditor, WithumSmith & Brown.

Ms. Marcotte stated that by June 2005, the B&C Agent is projecting a fund balance of approximately \$6.2 Million. A fund balance of approximately \$7.3 Million is expected by December 2005.

Ms. Marcotte reported that the transition is complete from NBANC and that everything is going well.

C. North American Portability Management LLC (NAPM LLC) Report. Karen Mulberry, MCI, presented the report to the Council. Ms. Mulberry apologized for not providing a written report. She reported that the NAPM LLC is working on the Change Order package (Statement of Work 49) referred by the LNPA WG. The NAPM LLC is in the process of discussing the business details related to it.

Chairman Atkinson requested that a written report be provided. Ms. Mulberry indicated that she will provide something in writing.

D. North American Numbering Plan Administrator (NANPA) Report to the NANC. John Manning, NANPA, provided the report to the Council.

Central Office Code (CO) Activity Report. Mr. Manning reported that in December 2004, NANPA assigned 194 CO codes. For the last part of 2004, the NANPA has been averaging over 250 code assignments per month. The final numbers for 2004 is slightly under 250 code assignments per month. Mr. Manning reviewed the chart that reflects the comparison between 2003 and 2004 code assignments by month, as well as changes, denials, and disconnects with the Council. He reported that the NANPA assigned 3,245 codes in 2003 and 2,678 codes in 2004. Mr. Manning reported that the quantity of denials is down. There is a significant drop in the quantity of codes that have been disconnected or returned. The 2004 assignments decreased by over 500 codes from 2003. Returned codes in 2004 were less than half of those in 2003. Net assignments in 2003 were 1,457; for 2004, net assignments were 1,817.

Update on the Red Light Rule. Mr. Manning stated that the Red Light Rule requires the NANPA to deny numbering resources to service providers who have delinquent payments to the FCC. He reported that since the implementation of the Red Light Rule, the NANPA has denied assignment of numbers on only three occasions due to the rule.

NPA Inventory. Mr. Manning stated that during 2004, the 521-529 NPAs became available. In addition, the 880, 881, and 882 NPAs were returned and, per the INC guidelines, reserved for future toll-free expansion. The net result was a decrease in six NPAs not available for assignment.

Mr. Manning reported that the NANPA assigned three NPA codes in 2004: 769 for Mississippi, 779 for Illinois, and 829 for the Dominican Republic.

Mr. Manning reported that two new NPAs went into service in 2004: 951 in California, and 684 in American Samoa. Over the past four years, three NPAs were placed in service in 2003, nine NPAs in 2002, 26 NPAs in 2001, and 14 NPAs in 2000.

In 2004, the INC modified the NPA Allocation and Assignment Guidelines to require the NANPA to reserve an area code to relieve specific geographic NPA codes forecasted to exhaust in the next 10 years (formerly it was 20 years) as identified in the most recent NANP NPA exhaust forecast. This resulted in the increase in the availability of general purpose NPA codes.

Status of NPA Codes Exhausting Within 36 Months. Mr. Manning reported that there are four NPAs currently projected to exhaust within the next 12 months: Mississippi 601, California 310, Georgia 706, and Illinois 630. NPA 706 in Georgia was placed in jeopardy in December 2004, and rationing is set at four codes per month.

NPA and NANP Exhaust Analysis. Mr. Manning reported that the NPA and NANP exhaust projections were posted to the NANPA website (www.nanpa.com) on January 10, 2004 and notice was sent to the NANC and the industry. The projections can be found under Reports, NRUF. Mr. Manning stated that the methodology used to develop these forecasts incorporated certain data elements that the NANPA has used for previous exhaust projections. Per the NANPA technical requirements, the NANPA will publish new NPA exhaust projections in April 2005. If it is necessary to revise an area code exhaust forecast prior to April 2005, the NANPA will publish a “delta” NRUF, similar to what the NANPA has done in previous years.

Mr. Manning stated that the NANPA projects the exhaust of the NANP based upon the utilization and forecast data submitted by carriers via the NRUF process. He reviewed the 2004 NANP Exhaust Projection Assumptions with the Council. Mr. Manning reported that using an average CO code demand rate of 6,500 codes assigned per year, and assuming the quantity of NPAs available is 685, the projected NANP exhaust date is beyond 2035.

NANPA Change Orders. Mr. Manning reported that the NANPA submitted four Change Orders over the past several months. On January 6, 2005, the FCC approved three NANPA Change Orders:

- Change Order #1 - LNPA Issue #434 – “Removal of Codes from NPAC When There are No Ported Numbers”
- Change Order #2 – Interim Red Light Rule Process
- Change Order #3 – NAS Implementation of the Red Light Rule

In addition, the FCC approved the NANPA’s request for a new Customized Reports Enterprise Service. The FCC did not approve NANPA Change Order #4 – LNPA Issue #407 – “Treatment of Dedicated Codes for Single Customers in a Pooling Environment.

NANPA Newsletter. The 4th Quarter 2004 NANPA Newsletter is now available on the NANPA website. It can be found under Publications, Newsletters. The Newsletter may also be accessed from the NANPA home page under “What’s New.”

E. Presentation by National Thousands-Block Administrator (PA). Amy Putnam, NeuStar, provided the report to the Council. Ms. Putnam reported that the following Change Orders were approved by the FCC in January 2005:

- Change Order No. 27 – Extend Forecast Report from 12 to 18 months
- Change Order No. 30 – INC Issue 423 – LERG Assignee confirmation of activation in the PSTN for Industry Inventory Pool
- Change Order No. 31 – Expand Query Options for Donation Report
- Change Order No. 32 – Modify Process for Deleting PAS work items
- Change Order No. 33 – Modify Search/Forms View Query
- Change Order No. 35 – Red Light Rule Interim Manual Process
- Change Order No. 36 – Red Light Rule System Modification

Ms. Putnam reported that Change Order No. 25 – A request from a carrier to have the PAS generate a Part 4 report, and Change Order No. 34 – Modify Part 1A Report were cancelled by the FCC. Those Change Orders will be resubmitted by the PA to conform to a NOWG recommendation to combine the two. Change Order No. 24 – LNPA WG PIM 24/INC CO/NXX Issue 364 Recurring NPAC reports, held in abeyance pending outcome of Change Order #26 Report and Recommendation, will be withdrawn and resubmitted. Ms. Putnam noted that the PA’s Change Orders have been coming in under budget.

Ms. Putnam reviewed the PAS Assignment Volume Report with the Council. She stated that there were 29,027 total assigned blocks as of January 1, 2004. On December 31, 2004, there were 61,118 total assigned blocks. The increase in total assigned blocks in 2004 was +111%.

For the November 2004 Thousands Block Pooling Report, 6,614 applications were approved; 499 applications were denied; and 695 applications were suspended. For the December 2004 Report, 5,534 applications were approved; 566 applications were denied; and 339 applications were suspended.

The PAS availability was 100% for November 2004 and 100% for December 2004.

Ms. Putnam reported on the Non-Participating Carriers Report. She stated that the PA prepared this report to notify the FCC of service providers that are not participating in pooling, but that the PA believes should be participating. The PA looks at whether or not the service provider:

- has a current forecast on file for a rate center or
- has any donations in that rate center or
- has taken any assignments in that rate center, or

- has marked any blocks as retained in that rate center.

If none of the above criteria are met, the service provider is listed on the Non-Participating Carriers Report. Prior to filing the report with the FCC, the PA contacts any service provider that is listed on the report either by telephone or email to allow them an opportunity to get off the list. Service providers were asked to submit their forecasts and donations by January 10, 2005. The PA completed processing the applications on January 17, 2005. The Report will be submitted to the FCC by the end of January 2005.

Ms. Putnam reported that the Pooling Implementation Managers (PIMs) audited the 18,986 rate centers in the PAS to confirm accuracy. She stated that 2,272 rate centers were corrected. 544 rate centers were changed from optional or excluded to mandatory because of the OMB bulletins. The changes are on the website at www.nationalpooling.com, click on Report, then Rate Center Changes. Ms. Putnam noted that all of the rate centers that were not mandatory in Missouri have been changed to optional.

Mark Lancaster, AT&T, questioned whether the 25% continues to apply after the 909 area code split and whether carriers are required to donate up to 25% contaminated blocks in the new 951 area code. Ms. Putnam stated that any rate centers that were subject to the 25% when they were in 909, if they are now in 951 would continue to be subject to the 25% contamination. Mr. Williams advised that he believed that the 25% contamination would hold. He further advised that he will send out an email next week with a definitive answer.

Courtney Jackson, OUR, stated that there are two issues in OUR's jurisdiction in relation to operators in the US and the impact of their use of numbering resources allocated in the US: Mobile country codes and the question of the export of US CO Codes by Vonage-type operators. Chairman Atkinson tasked the Future of Numbering (FoN) Working Group to look at the issue. Ms. Mulberry suggested that Mr. Jackson write up the issues and send it to the FoN Co-Chairs (Hoke Knox and Ms. Mulberry) to circulate to the FoN WG for consideration.

F. Industry Numbering Committee (INC) Report. Ken Havens provided the report to the Council. Mr. Havens reviewed the INC Meeting Schedule with the Council.

CO/NXX Subcommittee. Mr. Havens stated that based on discussions at the November 4, 2004 NANC meeting the Nebraska PSC submitted an issue to enable regulators and service providers to voluntarily consider the transfer of codes for LRN purposes to avoid opening a new code. The INC agreed to text changes in Section 7.2 of the CO Code Guidelines, and the issue is in initial closure.

Anna Miller, T-Mobile USA, Inc., questioned the issue going to final closure given the pending Nebraska Petition and the comments that were filed in the petition. Mr. Havens explained that all of the issues that went into initial closure at the last INC meeting have already gone into final closure. He further explained that the INC took this particular

issue and put it to initial pending with the expectation that if there was any concern with the issue going to final closure, the January NANC meeting would provide service providers and regulators an opportunity to make further comment. Ms. Miller stated that T-Mobile would like to hold the issue pending comments.

After further discussion, Mr. Havens read the following proposed changes to Section 7.2 of the CO Code Guidelines:

“Should a regulatory authority ask service providers to voluntarily transfer a code for purposes of enabling an LRN, consideration must be given to the technical issues involved, e.g., contamination levels, dependencies on ancillary services, etc.” Footnote: “Regulators may ask a service provider to voluntarily transfer NXX code assignments to another service provider in order to extend the life of an NPA code.”

Mr. Havens advised that if any Council member, service provider, or regulator objects to a particular issue going to final closure, they should send an email or note to the INC Administrator. He indicated that it will prevent an issue from going to final closure.

Ms. Miller questioned whether some carriers voluntarily transfer NXX code assignments to another service provider. She further questioned whether Mr. Havens would document it as a voluntary process in the INC Guidelines so that there would be some reference point. Mr. Havens responded yes. Chairman Atkinson questioned whether there were any objections from the Council members. There were no objections.

NPA Subcommittee – US Dept. of Navy Request for NPA. Mr. Havens reported that at its last meeting, the INC continued its discussion of the INC Issue 459, “Request to Consolidate Country Code Number 1 Assets of the United States Department of the Navy (DON) for a Newly Issued Area Code.” The INC reviewed additional contributions for clarification from the DON.

Mr. Havens stated that as part of its technical review, the INC issued a letter requesting input from various industry forums on the effects of the NPA assignment in question. The groups include the NANC LNPA Working Group, the Canadian Steering Committee on Numbering, the Common Interest Group on Rating and Routing, Emergency Services Interconnection Forum, the Network Interconnection and Interoperability Forum, the Ordering and Billing Forum, the Packet Technologies and Systems Committee, the Telecom Management and Operations Committee, and the Toll Fraud Prevention Committee. The INC requested responses from those forums in time for discussion at its next two meetings.

Mr. Manning stated that the NANPA, following the NPA Allocation Assignment Guidelines, also sent a letter out on this issue to all of the NANP member countries asking them for their input on this matter. He indicated that the requested response date is by the mid-February timeframe. Mr. Manning advised that the NANPA has received one response thus far, from the FCC, and it has been shared with the Future of

Numbering Working Group (FoN WG) and will also be shared with the INC at its upcoming meeting.

Mr. Havens advised that the INC is participating with the FoN WG that is also looking at the same issue and will share information from its technical review with the FoN WG. Chairman Atkinson questioned when the INC will have final closure on this issue. Mr. Havens stated that the INC will chair a conference call inviting all of the forums to attend with the DON. This will provide an opportunity to for the forums to ask questions of the DON in order to facilitate the expeditious closure of this issue. Mr. Havens stated that at this point, the INC has not determined when it might expect final closure, but is hopeful that it may be done sometime in April 2005. He advised that the INC will be meeting in two weeks and will discuss the DON issue.

LNPA Subcommittee. Mr. Havens stated that based on the NANC IMG findings and direction, Issue 407 was placed in Initial Closure at INC 78. The resolution supports giving service providers the option to process a code request for a dedicated customer in a pooling rate area through the PA, or through the NANPA.

Issues Remaining in Initial Pending Due to Change Order Process. Mr. Havens reported that Issue 458 – Reduce “Aging Period” for Returned/Reclaimed Blocks - is still outstanding.

Issues in Final Closure. The following are issues that were placed into Final Closure from the last INC meeting:

- Issue 460: Remove Signature on File Requirement
- Issue 461: Mandatory Test Line Number for All New NXXs
- Issue 369: Forecasting – Suggestions to the Way Forecasting is Implemented
- Issue 446: Add Remarks Field to Part 1A
- Issue 448: Permitting NANPA to Seek Withdrawal of Unapproved Petitions and Requesting Dismissal of Approved Relief Petitions
- Issue 450: Clarification for MTE Calculations When Requesting Additional Blocks for Growth

Don Gray thanked Chairman Atkinson for the assignment of the Nebraska PSC issue to the INC at the November 4, 2004 NANC meeting. He gave special thanks to the INC, Mr. Havens, and Mr. Newman for their participation and prompt action. Mr. Gray stated that it was a lot of hard work for the members to understand the issue and address the various components and elements of the issue. He further stated that it was a team effort in resolving the issue and coming up with something that is going to be a benefit for everybody.

Jena Downs, Verizon, stated that there seems to be a conflict between what the INC is recommending and what the FCC denied with regard to Issue 407. Mr. Havens stated that a service provider must work through the PA for a dedicated code. He advised that the reason the service provider must work directly with the PA is because the FCC

language specifies that the service provider must do it in all areas where pooling exists. Mr. Havens indicated that Issue 407 deals with whether or not the process whereby the service provider must work through the PA can be modified so that the service provider will be able to work directly with the NANPA in the assignment of dedicated code. He advised that Issue 407 went to Final Closure at the INC. Mr. Havens advised that a Change Order was created by the NANPA. He indicated that the NOWG had not yet made a recommendation. Mr. Havens stated that Mr. Williams asked the NOWG to stop its work on the recommendation.

Mr. Williams stated that the FCC denied the Change Order specifically because an FCC Report and Order states that carriers had to go to the PA in order to get a code. He advised that an FCC Order may not be changed through the Change Order process.

Mr. Havens inquired how the NANC may initiate the change.

Mr. Williams advised that the NANC may make a recommendation to the Chief of the Wireline Competition Bureau.

Mr. Havens advised that the NANC had established an Issue 407 IMG. He indicated that the IMG concluded, in agreement with the INC, that this was a good process improvement, i.e., that the language should, in fact, be changed. Mr. Havens questioned whether the NANC should make that recommendation to the FCC.

Fred McCallum, BellSouth, proposed that the NANC make the recommendation to the Chief of the Wireline Competition Bureau, consistent with the INC findings and the IMG findings on this issue. Douglas Sullivan, Verizon, supported the proposal.

Christine Sealock Kelly, NARUC, NY, seemed to recall some concerns expressed in the IMG's Final Report. She recommended that if there were concerns expressed in the IMG's report, and if the NANC is going to make the recommendation, those concerns should be included in the NANC's recommendation.

Chairman Atkinson recommended that the IMG Report be located. He will put together a cover letter and circulate it to the Council members. Chairman Atkinson indicated that the Council members can comment on the cover letter and anything else that needs to be communicated to the Chief of the Wireline Competition Bureau. John Jefferson, SBC, volunteered to locate and circulate the electronic version of the IMG Report to the Council members.

G. Safety Valve IMG Status Report. Douglas Sullivan, Verizon, provided an update to the Council.

Mr. Sullivan provided background regarding the creation of the Safety Valve IMG. He stated that during the November 4, 2004 NANC meeting, Qwest made a presentation concerning an issue that it was having with the safety valve process. Qwest reported that the process was taking significantly longer than the 10 days that had been identified as a

reasonable time period by the FCC in the Third Report and Order (FCC-01-362 Section 58-66). The average time was 35 days, with a minimum of 3 days and a maximum of 313 days.

Mr. Sullivan pointed out that because numbering resource safety valve requests are usually made to either respond to a specific customer's request for numbering resources or for a Location Routing Number (LRN) for additional switch capabilities in a rate center, a delay in obtaining the resources can be customer impacting.

Mr. Sullivan advised that the NANC created an action item for a Safety Valve Issue Management Group (IMG) to determine the scale and scope of the safety valve problem and, if a change is recommended, propose modifications to the safety valve process to minimize the customer impact of delayed safety valve waivers. He advised that the initial task of the IMG was to conduct one conference call to report back to the NANC on the scale and scope of the problem. He indicated that it took a bit more than just one conference call. The IMG has conducted four meetings thus far. Mr. Sullivan stated that the IMG has not yet completed a final report. He advised that the IMG will provide a final report at the March 15, 2005 NANC meeting.

The Safety Valve Process was reviewed with the Council.

The recommendations of the IMG are as follows:

- Recognition be given to those states that are actively engaged in numbering resource issues and responding to safety valve requests in a timely manner.
- Carriers should continue working with the individual states that are not responding in a timely manner to safety valve requests.
- Carriers should bring issues of this type to the attention of any regional operating groups for discussion.
- The NARUC members of the NANC should bring the issue of timely responses to service providers' requests back to the NARUC for discussion.
- The safety valve process should be modified to include a period of time in which a state regulator must take some positive action (approve, deny, or take ministerial action). If such action is not taken, the service provider may reapply to the NANPA/PA with appropriate documentation for the automatic assignment of the requested resources.

Mr. Sullivan reported that there were some NARUC representatives on the IMG that could not support this modification of the safety valve process. The concern is that such action limits the delegated authority of states and may not take into consideration the administrative process of an individual state or the competing demands for state regulators' time and attention. Additionally, they could not support the automatic assignment of requested resources in the event a timely response is not made to a carrier request. Safety valve requests are to be closely scrutinized pursuant to direction from the FCC. Lastly, in paragraph 62 of the 3rd R&O on numbering resource optimization, the FCC discussed, and discarded, self certification for safety valve requests. The dissenting

representatives believe that the FCC clearly set forth in its Order at paragraph 66 that application by the carrier to the FCC is the appropriate action in the event a timely response is not made by the state. Any modification of the FCC Order is best handled by petition to the FCC in order to afford full notice and comment to affected parties.

Mr. Sullivan reported that the Safety Valve IMG proposed the creation of a self-certification checklist for service providers requesting a safety valve and a two-phased implementation of an “action clock” for states when a safety valve is received. The checklist will only apply in the event that the NANPA/PA is allowed to automatically process requests.

Mr. Sullivan reviewed Implementation Issues Not Addressed, Other Issues, and Implementation of the Recommendations with the Council.

Chairman Atkinson requested that the IMG provide some examples of how this issue is customer-impacting at the March 15, 2005 NANC meeting. He indicated that the examples will provide some context to the issue of urgency.

Chairman Atkinson suggested that a list of the states that do not respond to safety valve requests in a timely manner would be helpful.

H. Local Number Portability Report (LNPA WG). Gary Sacra, Co-Chair, provided the report to the Council. Mr. Sacra reported on an Action Item related to Problem Identification and Management Report (PIM) 30 which address the roles and responsibilities of carriers with regard to N-1 architecture. The Action Item was assigned to the LNPA WG at the May 18, 2004 NANC meeting. Mr. Sacra stated that subsequent to the May meeting, the NANC added an Action Item for the LNPA WG to address N-1 responsibilities in the extended area service call scenarios.

Mr. Sacra advised that the LNPA WG has completed its analysis of FCC Orders and other relevant industry documentation. The LNPA WG put together a White Paper of the various call scenarios and whom the LNPA believes is responsible for doing the N-1 query and call routing. The following is detailed in the White Paper along with the relevant sites from the various documents to support the LNPA WG’s interpretation.

- The LNPA WG would like to stress that if all carriers complied with the following interpretation of the N-1 architecture, based on research of FCC mandates, and performed the necessary LNP query when they were designated as the N-1 carrier on a call to a portable NXX code, a carrier rarely would be forced to perform the query on a default-routed basis.
- Local Calls: The originating carrier is the N-1 carrier and is responsible for performing the query in its network or entering into an agreement with another entity to perform the queries on its behalf.

- InterLATA Toll Calls: For an interLATA Toll call, the IXC is the N-1 carrier and is responsible for performing the query in its network or entering into an agreement with another entity to perform the queries on its behalf.
- IntraLATA Toll Calls: Where the originating carrier is the Pre-subscribed IntraLATA Carrier for the calling party, the originating carrier is the N-1 carrier and is responsible for performing the query in its network or entering into an agreement with another entity to perform the queries on its behalf.
- IntraLATA Toll Calls: Where the originating carrier is NOT the Pre-subscribed IntraLATA Carrier for the calling party, the Pre-subscribed IntraLATA Carrier is the N-1 carrier and is responsible for performing the query in its network or entering into an agreement with another entity to perform the queries on its behalf.
- A carrier may bill the N-1 carrier for performing the default query when the N-1 carrier default routes a call unqueried.
- Unless specified in business arrangements, carriers may block default routed calls incoming to their network in order to protect against overload, congestion, or failure propagation that are caused by the defaulted calls. (This is a direct quote from the Architecture Plan.)
- Regardless of the status of a carrier's obligation to provide number portability, e.g., has been granted a waiver or is operating outside a mandated area, all carriers have the duty to route calls to ported numbers.

Extended Area Service (EAS):

- On intraLATA calls to EAS codes, the originating carrier is the N-1 carrier and is responsible for the query on all calls to portable EAS codes.
- In cases where the originating carrier's switch supports the function to route interLATA EAS calls to ported numbers as a local call via an interLATA LRN, and trunking to all potential final destinations (or their POIs in the EAS area) have been established, the query will be performed in the originating switch.
- On interLATA calls to EAS codes where the originating carrier does not support the function to route the call as a local call to ported numbers via an interLATA LRN, the donor carrier in the terminating LATA performs the role of the N-1 carrier (i.e. does the database dip and routes the call to the switch serving the ported number).
- The donor carrier in the terminating LATA may charge the originating carrier for transit (consisting of transport and switching) of the call.

Chairman Atkinson questioned whether there is any recommendation with regard to EAS from the LNPA WG that should go to the FCC. Mr. Sacra stated that the LNPA WG feels that it would be appropriate to send something to the FCC asking for its endorsement on the LNPA WG's findings on EAS.

Hoke Knox, Sprint, questioned whether there was any opposition to the N-1 arrangement. Mr. Sacra stated that some segments of the industry were concerned about tagging the donor/carrier as the N-1 carrier because of the concern about the cost of doing default queries. He noted that one of the stipulations in the White Paper is that as technology changes, certain switch vendors develop features to enable calls to interLATA LRNs to route properly and that providers purchase those features and install them in their switches when they become available. Mr. Sacra indicated that this could be revisited to see if it is appropriate for the originating carrier to be the N-1 carrier in this call scenario.

Chairman Atkinson stated that at this stage, the recommendation would be page 11 of the White Paper to go to the FCC. He indicated that he will work with Mr. Williams on what clarification is needed, i.e., whether it has to go out on Public Notice, whether it is a rule change, or another process. Chairman Atkinson suggested that carriers that are not complying should be charged. Mr. Sacra pointed out that there are a number of carriers that do not have the capability for default routing to bill for performing default queries.

Chairman Atkinson made an Action Assignment to the Industry Associations to distribute the LNPA WG N-1 White Paper to its members for information and guidance.

Mr. Sacra reported that at its October meeting, the NAPM LLC approved a motion to send the recommendation software package to NeuStar for development of a Statement of Work (SOW).

NeuStar has delivered a SOW to the NAPM LLC. The NAPM LLC and NeuStar are currently working out details of the SOW.

Mr. Sacra reported that an issue was raised at the December 2004 LNPA meeting related to the portability of a Type 1 number, where the wireless carrier is required to port, but the underlying wireline carrier for the Type 1 number has a waiver. It was the consensus of the group that due to technical issues, e.g., inability to perform default queries, code not opened in NPAC or marked portable in the LERG, or without LNP capability, these numbers cannot be ported or migrated.

PIM Report. Mr. Sacra reviewed the PIM Report with the Council. He pointed out that the format of the PIM report has changed based on an Action Item from the November 4, 2004 NANC meeting to the LNPA WG to provide more time detail to the PIM report. It was decided that going forward, when reviewing the PIM Report, Mr. Sacra should bring to the NANC's attention only items as they are closed or where there is a dispute. Chairman Atkinson commented that the report itself is pretty clear. Mr. Sacra stated that the LNPA WG is receptive to any suggestions regarding reformatting or changes to the PIM Report.

I. Numbering Oversight Working Group (NOWG) Report. Rosemary Emmer, Co-Chair, provided the report to the Council. Ms. Emmer thanked the FCC on behalf of the NOWG for acting on the Change Orders and becoming current for 2005.

PA Change Order Recommendations. Ms. Emmer reported that the NOWG recommends that Change Orders 31-33 be approved and implemented at the same time. She indicated that they are all Service Provider (SP) enhancements in the PAS.

- Change Order #31- gives SPs a way to further define the search criteria. The SPs would be able to obtain only the specific information related to their OCN(s) rather than getting everything in an NPA and having to re-sort to find their information.
- Change Order #32 – gives SPs a way to delete items from their PAS inbox in multiples instead of the current one at a time – which is quite time-consuming for carriers heavily involved in pooling.
- Change Order #33 – proposes that the PAS be modified to enable service providers to view only the form that are related to a specified thousands-block when specifying the NPA-NXX-X as the search criteria. The new NPA-NXX-X column will be added to the Search Forms/View Form query results screen.
- Change Order #34 – proposes that the PAS be modified to add a column on the Part 1A Report entitled “Part 3 Effective Date”. The originator of this request withdrew the request. The NOWG does not recommend that this Change Order be approved, but suggests that the PA create a new Change Order for a Part 4 report that lists not only the LERG effective date, but also the date the Part 4 is due for each block assignment. The report should also indicate if the Part 4 has been received or not.
- Change Order #37 – INC Issue #458 – Reduce Aging Period for Returned/Reclaimed Blocks – proposes changes to the PAS to reduce the “aging period” on returned/reclaimed blocks from 90 days to 45 days. The NOWG supports this Change Order because the industry will benefit if blocks are available for (re)assignment sooner rather than later.

Status of the New PA Technical Requirements. Ms. Emmer reported that the NOWG has been working on updating the New PA Technical Requirements. The NOWG recommendation will be provided to the NANC at the March 15, 2005 NANC meeting.

Status of the NANPA and PA 2004 Performance Surveys. Ms. Emmer reported that the NANPA and PA draft surveys were circulated for comment on November 1, 2004. Proposed changes were discussed and appropriate modifications were made. The surveys are in final draft status. Once the NANC approves the final draft, the NOWG will initiate the performance evaluation process.

Ms. Emmer stated that the NOWG is seeking NANC approval and permission to initiate the Performance Evaluation process. If approved, the surveys will be posted to the Numbering Administration websites on January 24, 2005. The surveys will be distributed by the Number Administrators via the email exploder list. The survey response date is March 4, 2005.

Ms. Emmer reviewed the NOWG Meeting Schedule with the Council.

Ms. Putnam expressed concern that people might confuse the NANPA and PA surveys if they are distributed and returned at the same time. Ms. Emmer advised that the NOWG had discussed the matter. The NOWG decided that it would be an overwhelming responsibility if the surveys were distributed at different times, and the workload would not be as difficult if they were distributed at the same time. Ms. Emmer stated that if distributing them at the same time does not work this year, the NOWG will stagger the distribution next year.

Chairman Atkinson suggested that the cover letter reference the fact that there are two surveys. He indicated that a cross reference should avoid confusion. Ms. Emmer agreed.

The NANC approved the NANPA and PA draft surveys and cover letters.

Chairman Atkinson encouraged the trade associations to encourage its members to participate in the surveys. There was discussion regarding various incentives that might inspire more participation.

J. Billing and Collection Working Group (B&C WG). Rosemary Emmer, provided the report to the Council. Ms. Emmer extended an invitation to Council members who would like to join the B&C WG.

Ms. Emmer reported that the Mission and Scope of the B&C WG has been finalized. She indicated that at the November 4, 2004 NANC meeting, the NANC approved the Mission and Scope but provided changes to the language. The B&C WG is awaiting NANC approval on the changes. The NANC approved the B&C WG Mission and Scope.

Ms. Emmer noted that she and Jim Castagna are currently serving as the Co-Chairs of the B&C WG. She thanked Fred McCallum, Bell South, for performing a Co-Chair type role with the B&C WG.

Chairman Atkinson asked that the B&C WG provide information on all financial matters to Council members in advance of NANC meetings so that the Council members will have time to review it and provide comments, if necessary. He indicated that this will also help when the B&C WG is requesting NANC approval.

Ms. Emmer reviewed the B&C WG Primary Activities, the Draft Proposed Timeline, the Next Steps and the January-February 2005 Meeting Schedule with the Council.

K. Future of Numbering Working Group (FoN WG). Hoke Knox provided the report to the Council. Mr. Knox indicated that the FoN WG has selected Ms. Mulberry & him to serve as the Co-Chairs. He requested NANC approval. Mr. Knox further requested NANC approval for the FoN WG Mission and Scope Statement. The NANC approved Mr. Knox and Ms. Mulberry as Co-Chairs of the FoN WG. The NANC also approved the Mission and Scope Statement of the FoN WG.

Status of the Department of the Navy (DON) NPA Request. Mr. Knox advised that the FoN WG analysis of the DON NPA request is currently underway. The INC is also working on the issue. Mr. Knox indicated that he had suggested to Adam Newman, INC Vice Chair, that the INC should take a look at whether or not 7-digit dialing could be maintained if there was a special NPA overlay for the DON. The FoN WG discussed the feasibility of using the 710 Government Emergency Telecommunications System (GETS) code and its impact. The issue of National Security was raised regarding a single NPA vs. random geographic number assignment. Pro's discussed: Number conservation; Con's discussed: National 10-digit dialing requirement. There were discussions relating to the following conditions:

- Return of all previously assigned geographic telephone numbers.
- Assignment should be to agency larger than the DON, such as the Department of Defense (DOD), for better number utilization.
- Transition period should be set.

The INC discussed whether this is precedent setting and to what extent NPA's will be offered to a government entity vs. a private entity.

Mr. Knox reviewed the FoN WG Meeting Schedule with the Council.

Mr. Knox acknowledged and thanked Jim Castagna for serving as the Secretary for the FoN WG. He stated that the FoN WG meetings are open to parties that would like to participate. The FoN WG would like to receive any contributions that parties have to offer concerning the DON NPA request, any impacts to the future of numbering, and exhaust of the NANP and its impact regarding VoIP. Contributions may be sent by email to Mr. Knox at Hoke.Knox@mail.sprint.com or Karen Mulberry at Karen.mulberry@mci.com.

Ms. Mulberry advised that the FoN WG will provide an analysis and report for the NANC to consider at the March 15, 2005 NANC meeting.

Mr. Knox stated that the FoN WG is waiting to see whether the INC will identify any policy issues.

Chairman Atkinson stated that the INC looks at the technical operational aspects of the issue and the NANC looks at the policy aspects. He presumed that the FoN WG will also assess whether there would be a net gain or loss of numbers to the NANP.

Chairman Atkinson asked the FoN WG to identify the pros and cons from a policy point of view. If the INC or someone else raises other subjects, those will have to be addressed when they are raised. Chairman Atkinson stated that he would like hear about any major issues from a policy point of view by the March 15, 2005 NANC meeting. The INC has its own timeframe, but they should be reporting on this as soon as possible. Chairman Atkinson presumed that a cost benefit analysis will be done.

Mr. Knox indicated that the FoN WG asked the DON to attend the next meeting of the FoN WG (January 25, 2005) and make a presentation to get everyone up to speed on the DON's request.

L. List of NANC Accomplishments. No new accomplishments have been added to the January 2005 list.

M. Public Participation. None.

N. Other business. Chairman Atkinson announced that there will be a special presentation on ENUM at the March 15, 2005 NANC meeting. Ms. Mulberry will provide an update from the ENUM LLC. Verisign will also give an ENUM update.

Next Meeting: March 15, 2005

ACTION ITEMS - January 19, 2005 NANC Meeting

1. Sanford Williams will provide clarification to the applicability of the 25% Contamination to the 951 NPA.
2. Chairman Atkinson and Mr. McCallum will draft a cover letter on INC 407, circulate it to the NANC for comment, and send to the Chief of the Wireline Competition Bureau to suggest adoption of the IMG report.
3. Chairman Atkinson will send Page 11 of the LNPA White Paper to the FCC to ask for FCC endorsement.
4. ALTS, CompTel, CTIA, USTA, NCTA, TIA, and OPASTCO to distribute the LNPA White Paper to its members with the suggestion that if all carriers would comply and be guided by the White Paper, that there would not be a problem. Each trade association should send Chairman Atkinson its cover email and/or letter.
5. Courtney Jackson will give the FoN WG input on the mobile and VoIP issues in the Caribbean.